

CYRUS JOUBIN, ESQ.

43 West 43rd Street, Suite 119 – New York, NY 10036
347-223-4296 (office); 703-851-2467 (cell)
718-228-7679 (fax)
joubinlaw@gmail.com

October 29, 2021

VIA ECF and E-MAIL

Honorable Katherine Polk Failla
United States District Judge
United States District Court
40 Foley Square
New York, New York 10007

MEMO ENDORSED

Re: Christopher Bates v. Rolando Mella, et al.
20 cv 7336 (KPF)

Dear Judge Failla:

As counsel for Plaintiff in the above-referenced matter, I write with Defendants' consent to respectfully request a four-week extension to file Plaintiff's motion for costs and attorney's fees. This is Plaintiff's first request for an extension to file the fee application. The reason for this request is that the parties need more time to negotiate and, hopefully, resolve the issue of fees and costs in this matter. Because Judgment pursuant to Rule 68 was entered on October 20, 2021, Plaintiff's application for fees and costs is presently due on November 3, 2021. A four-week extension would give Plaintiff until December 1, 2021, to file his fee application.

Thank you for your time and consideration.

Sincerely,



Cyrus Joubin, Esq.

Application GRANTED.

SO ORDERED.

Date: November 1, 2021
New York, New York



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE